

## **EXHIBIT C**

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Michelle Simha, as  
Trustee for the  
Next-of-Kin of Noah  
Leopold,

Plaintiff,

Civil File No.  
24-CV-01097-JRT-DTS

vs.

Mayo Clinic,

Defendant.  
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DEPOSITION OF MICHAEL PICK

Volume I, Pages 1 - 58

August 12, 2024

(The following is the deposition of Michael  
Pick, taken pursuant to Notice of Taking  
Deposition, via video, at Mayo Clinic, Legal  
Department, 100 2nd Street SW, Rochester,  
Minnesota, commencing at approximately 12:41  
p.m., August 12, 2024.)

1 APPEARANCES:

2 On Behalf of the Plaintiff:

3 Brandon Thompson  
4 Bibeane Metsch-Garcia (via Zoom)  
5 CIRESI CONLIN LLP  
6 225 South Sixth Street  
7 Suite 4600  
8 Minneapolis, Minnesota 55402

9 On Behalf of the Defendant:

10 Andrew Brantingham  
11 DORSEY & WHITNEY LLP  
12 50 South Sixth Street  
13 Suite 1500  
14 Minneapolis, Minnesota 55402

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16 ALSO PRESENT:

17

18 Ron Huber, Videographer  
19 Anna C. Messerly, Ciresi Conlin  
20 Maggie Palmisano, Ciresi Conlin (via Zoom)  
21 Michelle Simha (via Zoom)  
22 Karen Leopold (via Zoom)  
23 Norman Leopold (via Zoom)  
24 Jenna Shulman (via Zoom)

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1 THE WITNESS: Go ahead.

2 MR. BRANTINGHAM: Hang on a second. I  
3 will object to the argumentative nature of the  
4 question. I'm not sure what the legitimate  
5 question is, but it's -- we can have it read  
6 back.

7 Q. The legitimate question is --

8 MR. THOMPSON: Oh, no. I'll just give  
9 him the question.

10 Q. The question is: Can you explain to me  
11 how you could possibly sit here and say that  
12 everything was done right when you don't even  
13 remember one single thing about what happened?  
14 Other than that's what the Mayo lawyers told you  
15 to say.

16 MR. BRANTINGHAM: Okay. Hang on a  
17 second.

18 MR THOMPSON: We'll strike that though.

19 Q. Go ahead.

20 MR. BRANTINGHAM: That's really --  
21 that's pretty bush league even for you, Brandon.  
22 No Mayo lawyer's instructed this witness to say  
23 anything in particular.

24 MR. THOMPSON: Okay. Right.

25 MR. BRANTINGHAM: Don't do stuff like